

# Exhibit G

**Jeffrey N. Leibell**

---

**From:** Chanler A. Langham <clangham@SusmanGodfrey.com>  
**Sent:** Tuesday, November 26, 2019 2:28 PM  
**To:** Jeffrey N. Leibell; Adam Zapala; Salzman, Hollis; Marc Seltzer; Richard A. Wojtczak  
**Cc:** Robin Niemiec  
**Subject:** RE: Auto Parts - EPP Ltr to Financial Recovery Strategies  
**Attachments:** PROPOSED ORDER: 12-00103

Jeffrey,

Thank you for speaking with me today. Based on our discussion, I understand that FRS has already submitted claims for the fleet purchases of each of its clients. Please send us a list of the claim numbers or entities that filed the claims. As discussed, here is the proposed briefing schedule for FRS's letter to the Court:

FRS Letter	December 16, 2019
EPP Opposition	January 16, 2020
FRS Reply	January 31, 2020

I have also attached a copy of the proposed stipulation with GEICO that we submitted to the Court on November 20. Please confirm that the above proposed schedule is acceptable and let us know whether you would like to discuss this matter further.

Regards,  
- Chanler

CHANLER A. LANGHAM  
PARTNER | SUSMAN GODFREY LLP  
713-653-7839 (OFFICE)  
713-377-2320 (MOBILE)  
CLICK [HERE](#) FOR BIO

THIS MESSAGE MAY CONTAIN PRIVILEGED AND CONFIDENTIAL INFORMATION. IF YOU'RE NOT THE INTENDED RECIPIENT, PLEASE DELETE THIS MESSAGE.

---

**From:** Jeffrey N. Leibell <jleibell@frsco.com>  
**Sent:** Monday, November 25, 2019 7:07 AM  
**To:** Chanler A. Langham <clangham@SusmanGodfrey.com>; Adam Zapala <AZapala@cpmlegal.com>; Hollis Salzman (hsalzman@rkmc.com) <hsalzman@rkmc.com>; Marc Seltzer <MSeltzer@SusmanGodfrey.com>; Richard A. Wojtczak <rwojtczak@susmangodfrey.com>  
**Cc:** Robin Niemiec <rniemiec@frsco.com>  
**Subject:** RE: Auto Parts - EPP Ltr to Financial Recovery Strategies

Counsel,

On behalf of our clients, FRS appreciates your continued willingness to engage on this matter.

At this point, however, it seems clear that, notwithstanding our mutual efforts to do so, we will not reach an agreement on the merits and, therefore, that a resolution will require bringing the matter to the Court's attention. With that in mind, we would like your consent to include in our letter and to describe as agreed upon – subject of course to the Court's approval – the following schedule that seeks to avoid disrupting anyone's holiday plans:

FRS Letter	December 2, 2019
EPP Opposition	December 20, 2019
FRS Reply	January 6, 2020

FRS will transmit to you our letter and our reply via email on the same days that each is submitted to the Court; we request the same courtesy concerning your opposition.

While we do not agree on the merits, we should be able to agree on the proposed manner for bringing this matter to the Court. Please let us know at your earliest convenience whether our suggested approach is agreeable.

Thank you again.  
Jeff

**Jeffrey N. Leibell**

Chief Legal & Financial Officer

201.853.1246 | [jleibell@frsco.com](mailto:jleibell@frsco.com) | [LinkedIn](#)



**Financial Recovery Strategies**

80 Wesley Street, South Hackensack, NJ 07606

201.853.0300 Main | 201.853.0301 Fax | [www.FRSCO.com](http://www.FRSCO.com)

*This email message is for the sole use of the intended recipient(s), and may contain confidential and privileged information. Any unauthorized review, use, disclosure or distribution is prohibited. If you are not the intended recipient, please contact the sender by reply email, and destroy all copies and attachments of the original message. If you are the intended recipient, please be advised that the content of this message is subject to access, review and disclosure by the sender's Email System Administrator.*

*The above communication is not intended to provide any tax advice. If you wish to obtain tax advice concerning any matter described or referred to in this email message, you should contact your tax advisor.*

*Financial Recovery Strategies (FRS) is a third-party class action settlement claims recovery consulting firm; we are not class counsel or a claims administrator. Class members may always file claims on their own without retaining FRS, and may contact class counsel and the claims administrator for information about a settlement and for claims filing assistance. FRS, if retained, works on an agreed-upon contingent commission basis.*

---

**From:** Chanler A. Langham <[clangham@SusmanGodfrey.com](mailto:clangham@SusmanGodfrey.com)>

**Sent:** Wednesday, November 6, 2019 7:42 PM

**To:** Jeffrey N. Leibell <[jleibell@frsco.com](mailto:jleibell@frsco.com)>

**Cc:** Adam Zapala <[AZapala@cpmlegal.com](mailto:AZapala@cpmlegal.com)>; Hollis Salzman ([hsalzman@rkmc.com](mailto:hsalzman@rkmc.com)) <[hsalzman@rkmc.com](mailto:hsalzman@rkmc.com)>; Marc Seltzer <[MSeltzer@SusmanGodfrey.com](mailto:MSeltzer@SusmanGodfrey.com)>; Richard A. Wojtczak <[rwojtczak@susmangodfrey.com](mailto:rwojtczak@susmangodfrey.com)>

**Subject:** RE: Auto Parts - EPP Ltr to Financial Recovery Strategies

Counsel,

We would like to clarify that, consistent with our previous conversations, the header should say "Privileged For Settlement Purposes Only Subject to FRE 408." We did not intend to assert the attorney-client or work product privilege over our communications because we do not have an attorney-client relationship with Financial Recovery Strategies or the entities it may represent.

Regards,  
- Chanler

CHANLER A. LANGHAM  
PARTNER | SUSMAN GODFREY LLP  
713-653-7839 (OFFICE)  
713-377-2320 (MOBILE)  
CLICK [HERE](#) FOR BIO

THIS MESSAGE MAY CONTAIN PRIVILEGED AND CONFIDENTIAL INFORMATION. IF YOU'RE NOT THE INTENDED RECIPIENT, PLEASE DELETE THIS MESSAGE.

---

**From:** Chanler A. Langham  
**Sent:** Saturday, November 2, 2019 9:20 PM  
**To:** [jleibell@frsco.com](mailto:jleibell@frsco.com)  
**Cc:** Adam Zapala <[AZapala@cpmlegal.com](mailto:AZapala@cpmlegal.com)>; Hollis Salzman ([hsalzman@rkmc.com](mailto:hsalzman@rkmc.com)) <[hsalzman@rkmc.com](mailto:hsalzman@rkmc.com)>; Marc Seltzer <[MSeltzer@SusmanGodfrey.com](mailto:MSeltzer@SusmanGodfrey.com)>  
**Subject:** Auto Parts - EPP Ltr to Financial Recovery Strategies

Counsel,

Please see the attached correspondence.

Regards,

CHANLER A. LANGHAM  
PARTNER | SUSMAN GODFREY LLP  
713-653-7839 (OFFICE)  
713-377-2320 (MOBILE)  
CLICK [HERE](#) FOR BIO

THIS MESSAGE MAY CONTAIN PRIVILEGED AND CONFIDENTIAL INFORMATION. IF YOU'RE NOT THE INTENDED RECIPIENT, PLEASE DELETE THIS MESSAGE.

**Jeffrey N. Leibell**

---

**From:** do\_not\_reply@mied.uscourts.gov  
**Sent:** Wednesday, November 20, 2019 5:00 PM  
**To:** Chanler A. Langham  
**Subject:** PROPOSED ORDER: 12-00103  
**Attachments:** Proposed\_Order\_20191120\_16\_59\_36\_602.docx

\*\*\* ATTORNEY COPY \*\*\*

Stipulation Regarding the Geico Entities Opting into the Settlement Classes and Proposed Order Thereon  
--- File originally uploaded as: 2019-11-20 Geico Stipulation to Opt In to EPP Round 4 Settlements.docx.

**-UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

IN RE: AUTOMOTIVE PARTS ANTITRUST LITIGATION	:	No. 12-md-02311
	:	Hon. Marianne O. Battani
	:	
In Re: Wire Harness Systems	:	Case No. 2:12-cv-00103
In Re: Heater Control Panels	:	Case No. 2:12-cv-00403
In Re: Automotive Bearings	:	Case No. 2:12-cv-00503
In Re: Anti-Vibrational Rubber Parts	:	Case No. 2:13-cv-00803
In Re: Windshield Wiper Systems	:	Case No. 2:13-cv-00903
In Re: Radiators	:	Case No. 2:13-cv-01003
In Re: Starters	:	Case No. 2:13-cv-01103
In Re: Automotive Lamps	:	Case No. 2:13-cv-01203
In Re: Ignition Coils	:	Case No. 2:13-cv-01403
In Re: HID Ballasts	:	Case No. 2:13-cv-01703
In Re: Electric Powered Steering Assemblies	:	Case No. 2:13-cv-01903
In Re: Fan Motors	:	Case No. 2:13-cv-02103
In Re: Fuel Injection Systems	:	Case No. 2:13-cv-02203
In Re: Power Window Motors	:	Case No. 2:13-cv-02303
In Re: Automatic Transmission Fluid Warmers	:	Case No. 2:13-cv-02403
In Re: Air Conditioning Systems	:	Case No. 2:13-cv-02703
In Re: Windshield Washer Systems	:	Case No. 2:13-cv-02803
In Re: Automotive Constant Velocity	:	Case No. 2:14-cv-02903
Joint Boot Products	:	
In Re: Spark Plugs	:	Case No. 2:15-cv-03003
In Re: Shock Absorbers	:	Case No. 2:15-cv-03303
In Re: Body Sealings	:	Case No. 2:16-cv-03403
In Re: Interior Trim Products	:	Case No. 2:16-cv-03503
In Re: Automotive Brake Hoses	:	Case No. 2:16-cv-03603
In Re: Exhaust Systems	:	Case No. 2:16-cv-03703
In Re: Ceramic Substrates	:	Case No. 2:16-cv-03803
In Re: Automotive Steel Tubes	:	Case No. 2:16-cv-04003
In Re: Access Mechanisms	:	Case No. 2:16-cv-04103
In Re: Side Door Latches	:	Case No. 2:16-cv-04303
	:	
THIS DOCUMENT RELATES TO:	:	
End-Payor Actions	:	

**STIPULATION REGARDING THE GEICO ENTITIES OPTING INTO THE  
SETTLEMENT CLASSES; AND [PROPOSED] ORDER THEREON**

This Stipulation is made in the above-referenced actions, subject to the approval of the Court, by and between the End-Payor Plaintiffs (“EPPs”), on the one hand, and Government Employees Insurance Company, GEICO General Insurance Company, GEICO Indemnity Company, GEICO Casualty Company, GEICO Advantage Insurance Company, GEICO Choice Insurance Company, GEICO Secure Insurance Company, and GEICO County Mutual Insurance Company (collectively, the “GEICO entities”), on the other hand, in light of the following:

- A. The GEICO entities were found by the Court to have validly requested exclusion from the Settlement Classes certified with respect to the Rounds 1, 2, and 3 Settlements;
- B. The deadline to request exclusion from the Settlement Classes certified with respect to the Round 4 Settlements will expire on November 19, 2019;
- C. The GEICO entities filed lawsuits alleging antitrust violations related to automotive parts against many of the defendants that settled with EPPs and the GEICO entities have now settled their claims against all of these defendants;
- D. The GEICO entities have represented and warranted and hereby do represent and warrant that no payments have been or will be made to any of them by the foregoing defendants based on their purchases or leases of qualifying vehicles made by the GEICO entities for their own account or the purchase of replacement parts purchased for those vehicles;
- E. The GEICO entities have now requested that they be allowed to opt into the Settlement Classes for Rounds 1, 2, and 3 for the limited purpose of submitting claims to share in the settlement funds established in this

litigation based solely on purchases or leases of qualifying vehicles made for their own account and not for resale and replacement parts purchased for those vehicles; and

- F. Co-lead Counsel for the EPPs have agreed to the GEICO entities' request on the terms and conditions described below.

**NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED**, subject to the approval of the Court, by the EPPs and the GEICO entities that the GEICO entities may opt into the Settlement Classes certified with respect to Rounds 1, 2, and 3 settlements and remain members of the Settlement Classes preliminarily approved pursuant to the Round 4 settlements on the following terms and conditions:

1. The GEICO entities may submit claims to share in the proceeds of the settlements solely with respect to the GEICO entities' purchases or leases of qualifying new motor vehicles purchased for their own account, and not for resale, and purchases of replacement parts for those vehicles. The term "purchased for their own account" means purchases of vehicles for use by the GEICO entities in their own fleets of vehicles and not purchases made pursuant to any obligations to any GEICO insureds or claimants against any GEICO insureds. The GEICO entities shall be required to document and provide proof of purchases or leases of qualifying new motor vehicles and purchases of replacement parts satisfactory to the Claims Administrator and as may be required by the Court and to otherwise comply with the requirements applicable to members of the Settlement Classes who submit claims to share in the settlement funds.



2. The GEICO entities agree to assert no claim to share in any of the class settlement funds and agree not to assert any claim against any class members or seek payments from any class members relating to the class settlements based on principles of contractual or equitable subrogation relating to policies of insurance issued by any of the GEICO entities, or any other basis, other than claims based solely on purchases or leases by the GEICO entities of qualifying new vehicles for their own account, and not for resale, and purchases of replacement parts for those vehicles. The GEICO entities also agree not to assign to anyone any claim to share in the settlement funds or against any class members or any payments to any class members. The GEICO entities hereby represent and warrant that they have made no such assignments. The GEICO entities also agree to assert no claims based on principles of contractual or equitable subrogation with respect to any claims of the EPPs, made on behalf of themselves or any and all classes they seek to represent, against any non-settling defendant or defendants.
3. The GEICO entities agree to assert no objections to any of the settlements, including, but not limited to, the Round 4 settlements, or the Plan of Allocation, or any other matter relating to any of the settlements.
4. The GEICO entities agree to be bound as absent class members by the terms of all of the class settlements entered or which may be entered by the EPP in this litigation.

Dated: November 20, 2019

Respectfully submitted,

/s/ Hollis Salzman

Hollis Salzman

William V. Reiss

Noelle Feigenbaum

**ROBINS KAPLAN LLP**

601 Lexington Avenue, Suite 3400

New York, NY 10022

Telephone: (212) 980-7400

Facsimile: (212) 980-7499

hsalzman@robinskaplan.com

wreiss@robinskaplan.com

nfeigenbaum@robinskaplan.com

/s/ Adam Zapala

Adam J. Zapala

Elizabeth T. Castillo

**COTCHETT, PITRE & McCARTHY, LLP**

San Francisco Airport Office Center

840 Malcolm Road, Suite 200

Burlingame, CA 94010

Telephone: (650) 697-6000

Facsimile: (650) 697-0577

azapala@cpmlegal.com

ecastillo@cpmlegal.com

/s/ Marc M. Seltzer

Marc M. Seltzer

Steven G. Sklaver

**SUSMAN GODFREY L.L.P.**

1900 Avenue of the Stars, Suite 1400

Los Angeles, CA 90067-6029

Telephone: (310) 789-3100

Facsimile: (310) 789-3150

mseltzer@susmangodfrey.com

ssklaver@susmangodfrey.com

Terrell W. Oxford

Chanler A. Langham

**SUSMAN GODFREY L.L.P.**

1000 Louisiana Street, Suite 5100

Houston, Texas 77002

Telephone: (713) 651-9366

Facsimile: (713) 651-6666

toxford@susmangodfrey.com

clangham@susmangodfrey.com

Floyd G. Short  
Jenna G. Farleigh  
**SUSMAN GODFREY L.L.P.**  
1201 Third Avenue, Suite 3800  
Seattle, Washington 98101  
Telephone: (206) 516-3880  
fshort@susmangodfrey.com  
jfarleigh@susmangodfrey.com

Steven M. Shepard  
**SUSMAN GODFREY L.L.P.**  
1301 Avenue of the Americas, Floor 32  
New York, New York 10019  
Telephone: (212) 729-2010  
sshepard@susmangodfrey.com

*Interim Co-Lead Class Counsel for the  
Proposed End-Payor Plaintiff Classes*

/s/ Frederick Baumann

Frederick J. Baumann (Adm ED MI, CO Bar  
12156)

**LEWIS ROCA ROTHGERBER  
CHRISTIE LLP**

Diane R. Hazel (Adm ED MI, CO Bar 42954)  
dhazel@lrrc.com  
1200 17th Street Suite 3000  
Denver, CO 80202  
fbaumann@lrrc.com

/s/ Kelly A. Myers

Kelly A. Myers (P49143)  
**MYERS & MYERS, PLLC**  
Rebecca J. Cassell (P64456)  
915 N. Michigan Avenue  
Howell, MI 48843  
(517) 540-1700  
kmyers@myers2law.com  
rcassell@myers2law.com

*Attorneys for Plaintiffs GEICO  
CORPORATION, et al.*

**ORDER**

Upon the foregoing stipulation, and good cause appearing therefor,

**IT IS HEREBY ORDERED THAT** the Stipulation is approved.

DATED \_\_\_\_\_

\_\_\_\_\_  
MARIANNE O. BATTANI  
United States District Judge

**CERTIFICATE OF SERVICE**

I hereby certify that on November 20, 2019, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Marc M. Seltzer

Marc M. Seltzer